

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

EVERYTOWN FOR GUN SAFETY
ACTION FUND, INC.,

Plaintiff,

v.

DEFCAD, INC.; ODYSEE USER
XYEEZYSZN; DEFCAD USER
XYEEZYSZN; ODYSEE USER
THEGATALOG-PRINTABLEMAGAZINES;
THE GATALOG; DEFCAD USER
FREEMAN1337; TWITTER USER
XYEEZYSZN; PHILLIP ROYSTER.

Defendants.

Civil Action No. 1:21-cv-8704

**SUPPLEMENTAL
DECLARATION OF DELIA
GREEN IN SUPPORT OF
PLAINTIFF’S APPLICATION
FOR ORDER TO SHOW CAUSE
FOR A PRELIMINARY
INJUNCTION AND TO
PRESENT NEWLY
DISCOVERED EVIDENCE**

I, Delia Green, declare as follows¹:

1. I am over eighteen (18) years old, and I am competent to testify to the facts in this Declaration based on my personal knowledge.

2. I am a paralegal at Venable LLP, counsel for Plaintiff Everytown for Gun Safety Action Fund, Inc. (“Everytown”).

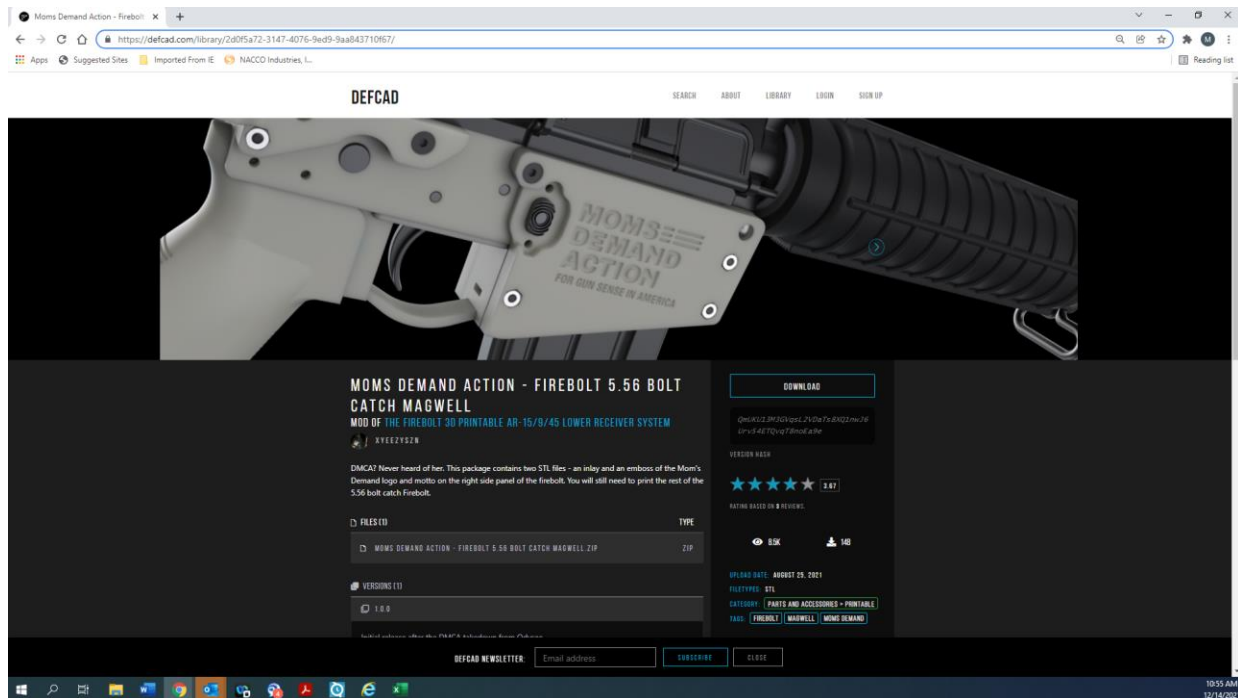
3. I submit this declaration to provide information to the Court that is newly discovered and in further support of Everytown’s request for injunctive relief.

4. Everytown owns and/or operates the domain name www.momsdemanaction.org in connection with its non-profit and advocacy work.

¹ All undefined terms herein are defined as in Plaintiff’s Complaint.

5. On December 14, 2021, when I attempted to access the domain name www.momsdemand.org, I was re-directed to the following url:
<https://defcad.com/library/2d0f5a72-3147-4076-9ed9-9aa843710f67/>.

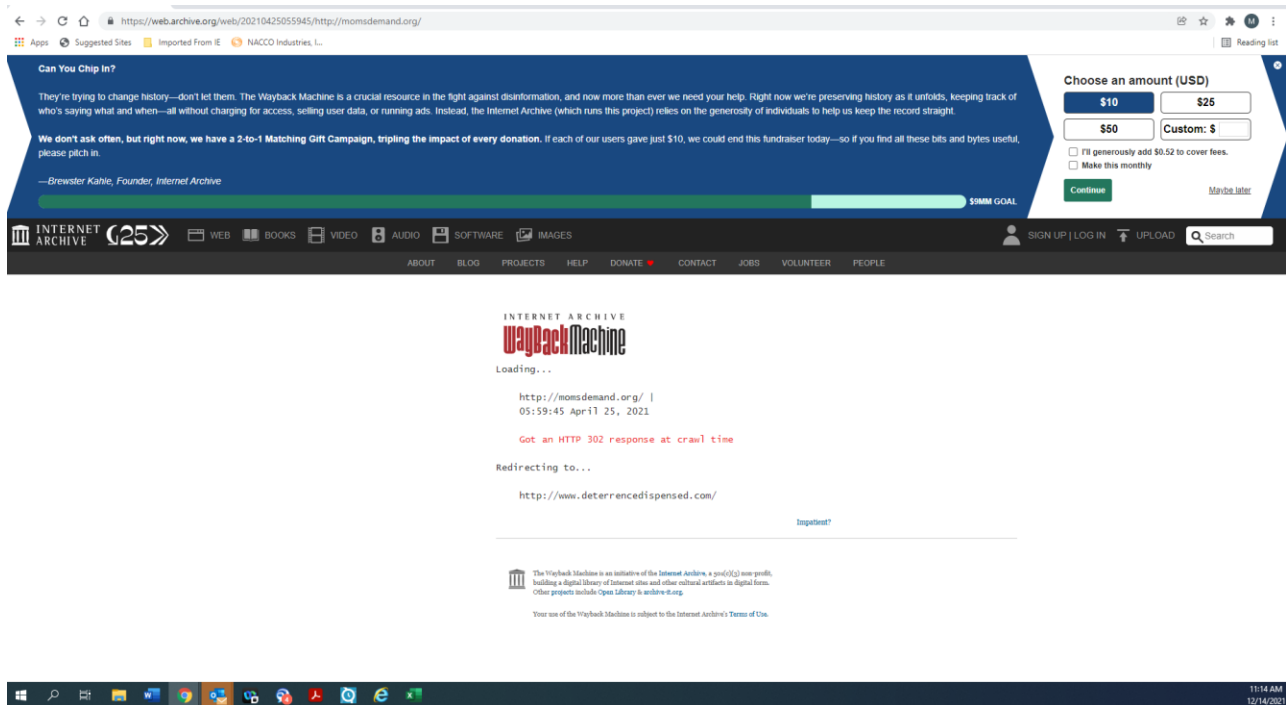
6. The URL <https://defcad.com/library/2d0f5a72-3147-4076-9ed9-9aa843710f67/> displayed Defendant Defcad User xYeezySZN's Infringing Product listing for "Moms Demand Action – FireBolt 5.56 Bolt Catch Magwell." A photograph of the URL page is depicted below.



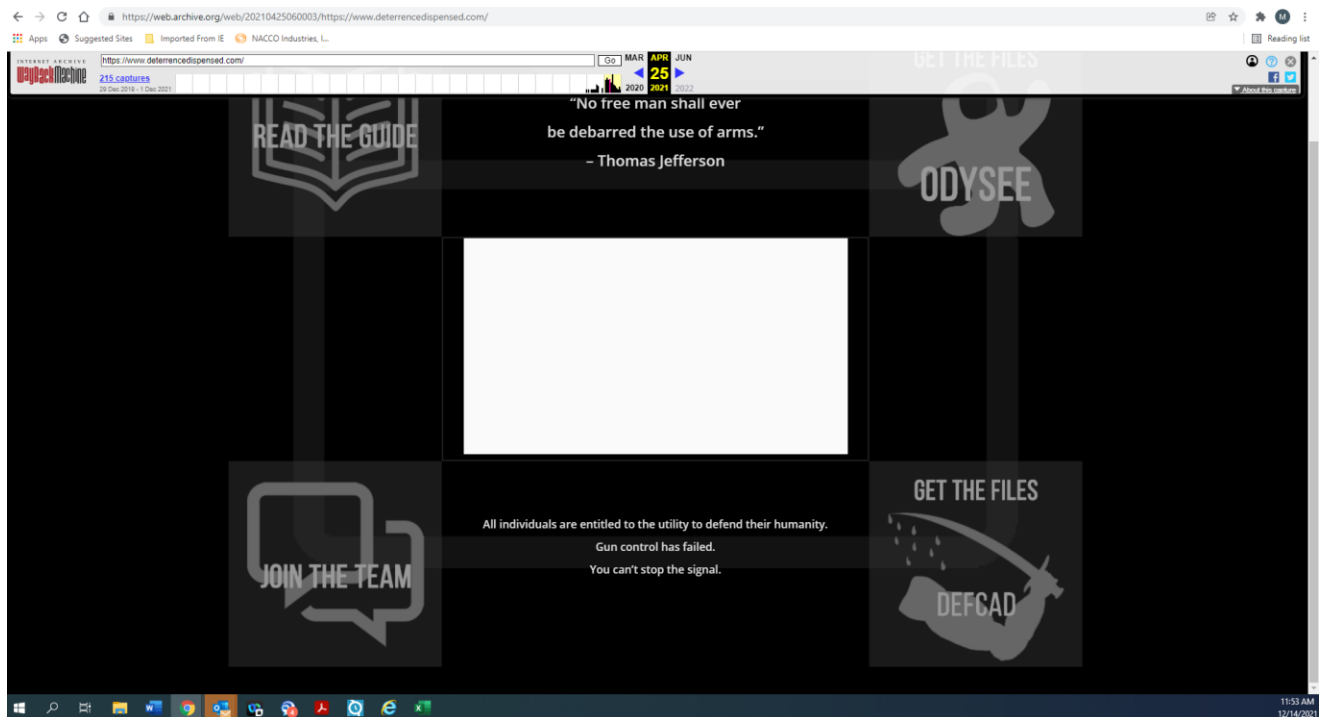
7. When searching the registrant information for the URL www.momsdemand.org on ICANN Lookup, the registrant information appeared to be privacy protected. A copy of the ICANN Lookup information for the URL www.momsdemand.org accessed on December 14, 2021 is attached hereto as **Exhibit A**.

8. Upon looking up www.momsdemand.org in the Wayback Machine Internet Archive I learned that the domain originally re-directed to a domain called www.deterrencedispensd.com. A screenshot of the Wayback Machine Archive page for

www.momsdeman.org as of April 25, 2021 showing re-direction to www.deterrencedispensd.com is below.

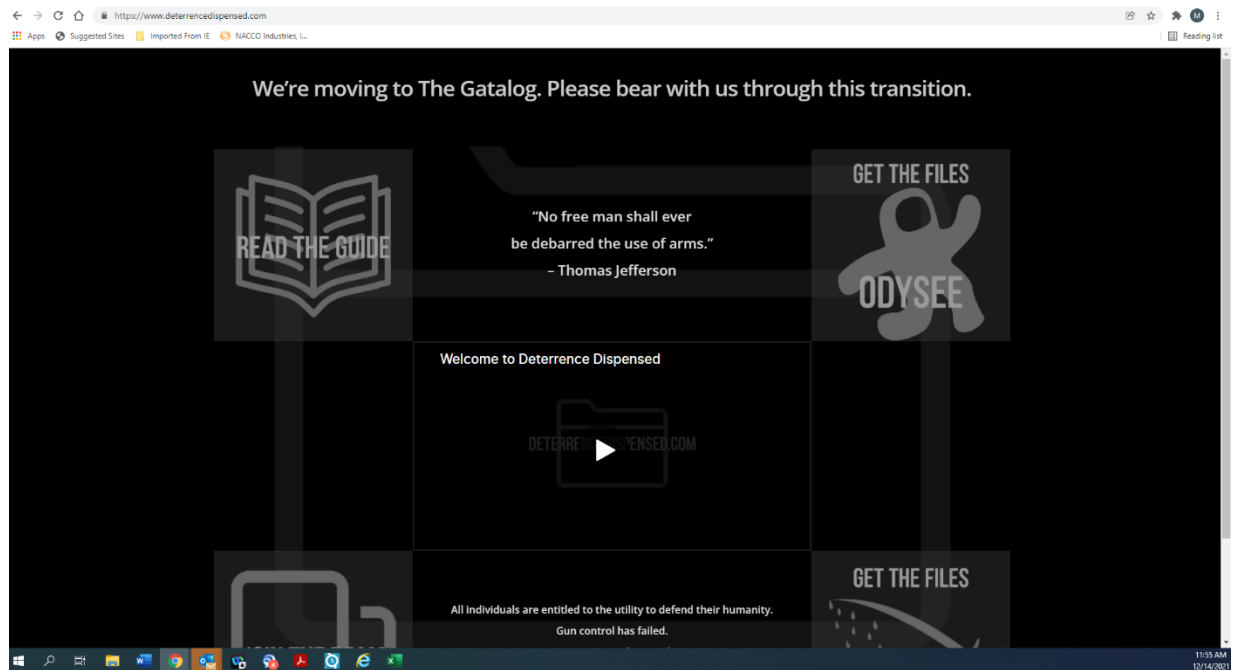


9. As of April 25, 2021 per the Wayback Machine Archive, the landing page for www.deterrencedispensd.com appeared as the below.

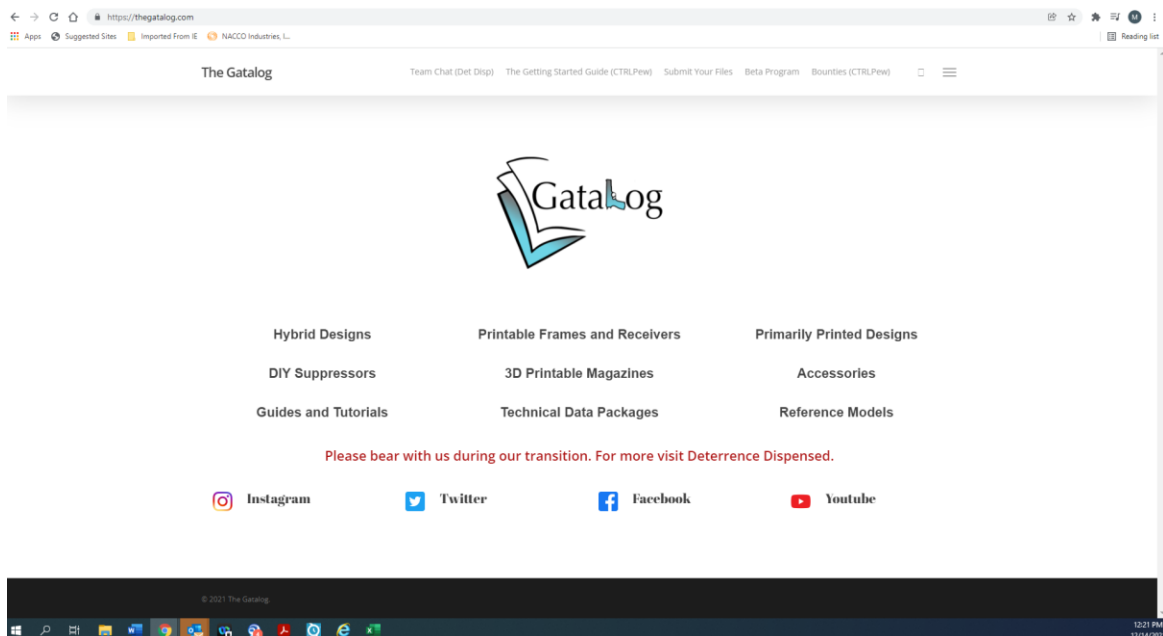


10. When searching the registrant information for the URL www.deterrencedispensd.com on ICANN Lookup, the registrant information appeared to be privacy protected. A copy of the ICANN Lookup information for the URL www.deterrencedispensd.com accessed on December 14, 2021 is attached hereto as **Exhibit B**.

11. When accessing www.deterrencedispensd.com on December 14, 2021 the landing page stated “[w]e’re moving to The Gatalog. Please bear with us through this transition.” A screenshot taken of the landing page www.deterrencedispensd.com on December 14, 2021 is depicted below.



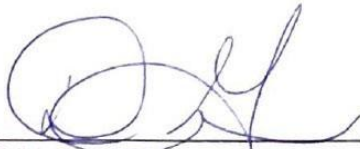
12. When accessing the website www.thegatalog.com, the homepage states “[p]lease bear with us during our transition. For more visit Deterrence Dispensed.” A copy of the homepage of www.thegatalog.com is depicted below.



13. When accessing the websites and URLs described above, I was located in New York in this judicial district.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: December 22, 2021



DELIA GREEN

EXHIBIT A

Registration data lookup tool

Enter a domain name or an Internet number resource (IP Network or
ASN) [Frequently Asked Questions \(FAQ\)](#) [\(/faq\)](#)

www.momsdemand.org

Lookup

By submitting any personal data, I acknowledge and agree that the personal data submitted by me will be processed in accordance with the ICANN [Privacy Policy \(https://www.icann.org/privacy/policy\)](https://www.icann.org/privacy/policy), and agree to abide by the website [Terms of Service \(https://www.icann.org/privacy/tos\)](https://www.icann.org/privacy/tos) and the [registration data lookup tool Terms of Use \(unsafe:javascript:void\(0\)\)](#).

The client was unable to process information from the Registrar RDAP server. The information below is shown as provided by the TLD Registry RDAP service.

Domain Information

Name: momsdemand.org

Registry Domain ID: D402200000016106133-LROR

Domain Status:
[clientTransferProhibited \(https://icann.org/epp#clientTransferProhibited\)](https://icann.org/epp#clientTransferProhibited)

Nameservers:
ns-cloud-a1.googledomains.com
ns-cloud-a2.googledomains.com
ns-cloud-a3.googledomains.com
ns-cloud-a4.googledomains.com

Dates

Registry Expiration: 2022-02-26 00:58:39 UTC

Updated: 2021-04-27 03:57:59 UTC

Created: 2021-02-26 00:58:39 UTC

Contact Information

Registrant:

Organization: Contact Privacy Inc. Customer 1249561463

Mailing Address: ON

ISO-3166 Code: CA

Redacted for privacy:
some of the data in this object has been removed

Registrar Information

Name: Google LLC

IANA ID: 895

Abuse contact email: registrar-abuse@google.com

Abuse contact phone: tel:+1.8772376466

DNSSEC Information

Max sig life: 3456000

Delegation Signed: Signed

Delegation Signer Data:

Key Tag: 25424

Algorithm: 8

Digest Type: 2

Digest: 124387AD45417DAB3B95A2751BF71D23720FA3FD8869F09BFD4F2A9123C2DBC0

Authoritative Servers

Registry Server URL: <https://rdap.publicinterestregistry.net/rdap/org/domain/momsdemand.org> (<https://rdap.publicinterestregistry.net/rdap/org/domain/momsdemand.org>).

Last updated from Registry RDAP DB: 2021-12-14 10:56:28 UTC

Registrar Server URL: <https://domainsrdap.googleapis.com/v1/domain/momsdemand.org> (<https://domainsrdap.googleapis.com/v1/domain/momsdemand.org>).

Notices and Remarks

Notices:

Terms of Use

Access to Public Interest Registry RDAP information is provided to assist persons in determining the contents of a domain name registration record in the Public Interest registry database. The data in this record is provided by Public Interest Registry for informational purposes only, and Public Interest Registry does not guarantee its accuracy. This service is intended only for query-based access. You agree that you will use this data only for lawful purposes and that, under no circumstances will you use this data to (a) allow, enable, or otherwise support the transmission by e-mail, telephone, or facsimile of mass unsolicited, commercial advertising or solicitations to entities other than the data recipient's own existing customers; or (b) enable high volume, automated, electronic processes that send queries or data to the systems of Registry Operator, a Registrar, or Afilias except as reasonably necessary to register domain names or modify existing registrations. All rights reserved. Public Interest Registry reserves the right to modify these terms at any time. By submitting this query, you agree to abide by this policy.

https://rdap.publicinterestregistry.net/rdap/org/terms_of_use (https://rdap.publicinterestregistry.net/rdap/org/terms_of_use).

Status Codes

For more information on domain status codes, please visit <https://icann.org/epp>

<https://icann.org/epp> (<https://icann.org/epp>).

RDDS Inaccuracy Complaint Form

URL of the ICANN RDDS Inaccuracy Complaint Form: <https://www.icann.org/wicf>

<https://www.icann.org/wicf> (<https://www.icann.org/wicf>).



Youtube (<http://www.youtube.com/icannnews>) Twitter (<https://www.twitter.com/icann>) Linkedin (<https://www.linkedin.com/company/icann>) Flickr (<http://www.flickr.com/photos/icann>)



Facebook (<http://www.facebook.com/icannorg>)



Newletters (<https://www.icann.org/resources/pages/global-newsletter-2018>)



Community Wiki (<https://community.icann.org/>)



ICANN Blog (<https://www.icann.org/news/blog>)

Who We Are

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Transparency**

Governance

Help

Data Protection

EXHIBIT B

Registration data lookup tool

Enter a domain name or an Internet number resource (IP Network or ASN) [Frequently Asked Questions \(FAQ\)](#) [\(/faq\)](#)

www.deterrencedispensd.com

Lookup

By submitting any personal data, I acknowledge and agree that the personal data submitted by me will be processed in accordance with the ICANN [Privacy Policy \(https://www.icann.org/privacy/policy\)](https://www.icann.org/privacy/policy), and agree to abide by the website [Terms of Service \(https://www.icann.org/privacy/tos\)](https://www.icann.org/privacy/tos) and the [registration data lookup tool Terms of Use \(unsafe:javascript:void\(0\)\)](#).

Domain Information

Name: DETERRENCEDISPENSED.COM

Registry Domain ID: 2429861828_DOMAIN_COM-VRSN

Domain Status:
[clientTransferProhibited \(https://icann.org/epp#clientTransferProhibited\)](https://icann.org/epp#clientTransferProhibited)

Nameservers:
NS3.EPIK.COM
NS4.EPIK.COM

Dates

Registry Expiration: 2023-09-04 17:26:17 UTC

Created: 2019-09-04 17:26:17 UTC

Contact Information

Registrant:

Name: Privacy Administrator

Organization: Anonymize, Inc.

Email: DETERRENCEDISPENSED.COM-1ibetojupmkhl@anonymize.com

Mailing Address: 1100 Bellevue Way NE, Ste 8A-601, Bellevue, WA, 98004, US

Administrative:

Name: Privacy Administrator

Organization: Anonymize, Inc.

Email: DETERRENCEDISPENSED.COM-1ibetojupmkhl@anonymize.com

Mailing Address: 1100 Bellevue Way NE, Ste 8A-601, Bellevue, WA, 98004, US

Technical:

Name: Privacy Administrator

Organization: Anonymize, Inc.

Email: DETERRENCEDISPENSED.COM-1ibetojupmkhl@anonymize.com

Mailing Address: 1100 Bellevue Way NE, Ste 8A-601, Bellevue, WA, 98004, US

Registrar Information

Name: Epik Holdings Inc
IANA ID: 617

DNSSEC Information

Delegation Signed: Signed
Delegation Signer Data:
Key Tag: 43211
Algorithm: 13
Digest Type: 2
Digest: F97EC17FA182F7B71DAB3C4BEFE8B23B268E9574C83CC9B9A642A32D87E45B97

Authoritative Servers

Registry Server URL: <https://rdap.verisign.com/com/v1/domain/deterrencedispensed.com> (<https://rdap.verisign.com/com/v1/domain/deterrencedispensed.com>).
Last updated from Registry RDAP DB: 2021-12-14 06:36:14 UTC
Registrar Server URL: <https://rdap-whois.epik.com/domain/DETERRENCEDISPENSED.COM> (<https://rdap-whois.epik.com/domain/DETERRENCEDISPENSED.COM>).

Notices and Remarks

Notices:

Terms of Service
Terms of Service
<https://www.epik.com/terms> (<https://www.epik.com/terms>).

Status Codes
For more information on domain status codes, please visit <https://icann.org/epp>
<https://icann.org/epp> (<https://icann.org/epp>).

RDDS Inaccuracy Complaint Form
URL of the ICANN RDDS Inaccuracy Complaint Form: <https://www.icann.org/wicf>
<https://www.icann.org/wicf> (<https://www.icann.org/wicf>).



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Community Wiki (<https://community.icann.org/>)



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